

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Emergent Fidelity Technologies Ltd,

Debtor.¹

)

) Chapter 11

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) Case No. 23-10149 (JTD)

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**NOTICE OF DEBTOR’S MOTION FOR ENTRY OF
AN ORDER (I) DIRECTING JOINT ADMINISTRATION
OF ITS CHAPTER 11 CASE AND (II) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on February 28, 2023, Emergent Fidelity Technologies Ltd (the “Debtor”), as debtor and debtor-in-possession under the control of Angela Barkhouse and Toni Shukla as the Joint Provisional Liquidators pursuant to the Appointment Order² of the Eastern Caribbean Supreme Court, High Court of Justice, Antigua and Barbuda, dated December 5, 2022, by and through counsel, filed the *Debtor’s Motion for Entry of an Order (I) Directing Joint Administration of its Chapter 11 Case and (II) Granting Related Relief* (the “Motion”) in the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion has been scheduled for **March 14, 2023, at 10:00 a.m., prevailing Eastern Time** before the Honorable John T. Dorsey, United States Bankruptcy Judge for the District of Delaware.

PLEASE TAKE FURTHER NOTICE that any responses to the relief requested in the Motion shall: (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the

¹ The Debtor in this Chapter 11 case is Emergent Fidelity Technologies Ltd, a company formed under the laws of Antigua and Barbuda with registration number 17532 as identified by the Antigua and Barbuda Financial Services Regulatory Commission. The Debtor’s principal place of business is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² The Appointment Order is attached as Exhibit B to the *Declaration of Angela Barkhouse in Support of the Debtor’s Chapter 11 Petition* [D.I. 3].

Local Rules for the United States Bankruptcy Court for the District of Delaware, and all General Orders applicable to the above-referenced chapter 11 case (the “Chapter 11 Case”); (c) be filed electronically with the Court on the docket of *In re Emergent Fidelity Technologies Ltd*, Case No. 23-10149 (JTD), by registered users of the Court’s electronic filing system and in accordance with the applicable General Orders (available on the Court’s website at <http://www.deb.uscourts.gov>) **by March 7, 2023 at 4:00 p.m., prevailing Eastern Time** (the “Objection Deadline”); and (d) be promptly served on the following parties: (i) proposed counsel to the Debtor, Morgan, Lewis & Bockius LLP, 101 Park Avenue, New York, NY 10178, Attn: Craig A. Wolfe (craig.wolfe@morganlewis.com), (ii) the Office of the United States Trustee for Region 3, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Juliet M. Sarkessian (Juliet.M.Sarkessian@usdoj.gov), and (iii) all entities that requested notice in the Chapter 11 Case under Fed. R. Bankr. P. 2002.

PLEASE TAKE FURTHER NOTICE that if no responses to the Motion are timely filed, served, and received in accordance with this Notice, the Court may grant the relief requested in the Motion without further notice or hearing.

[Signature page to follow]

Dated: February 28, 2023
Wilmington, DE

MORGAN, LEWIS & BOCKIUS LLP

/s/ Jody C. Barillare

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*Proposed Counsel for Emergent Fidelity
Technologies Ltd as Debtor and Debtor-in-
Possession*